LUKAS, NACE, GUTIERREZ & SACHS

CHARTERED

1111 NINETEENTH STREET, N.W. **SUITE 1200** WASHINGTON, D.C. 20036

RUSSEL D. LUKAS DAVID L. NACE THOMAS GUTIERREZ ELIZABETH R. SACHS GEORGE L. LYON IR JOEL R. KASWELL PAMELA L. GIST DAVID A. LAFURIA MARILYN SUCHECKI MENSE PAMELA GAARY HOLRAN B. LYNN F. RATNAVALE TODD SLAMOWITZ DAVID M. BRIGLIA ALLISON M. JONES STEVEN M CHERNOFF

(202) 857-3500

CONSULTING ENGINEERS ALI KUZEHKANANI LEROY A. ADAM LEILA REZANAVAZ

OF COUNSEL JOHN J. McAVOY J.K. HAGE III+ LEONARD S. KOLSKY+

WRITER'S DIRECT DIAL (202) 828-9479 tslamowitz@fcclaw.com

April 16, 2002

+ NOT ADMITTED IN D.C.

Magalie R. Salas, Secretary Federal Communications Commission 445 Twelfth Street, S.W. Washington, D.C. 20554

> Re: CC Docket 94-102

> > Quarterly TTY Implementation Report:

Edge Wireless Licenses, LLC.

Dear Ms. Salas:

On behalf of Edge Wireless Licenses, LLC. ("Edge") this letter is submitted to report the status of the company's implementation of the capability to transmit 911 calls from text telephone (ATTY@) devices.

Edge is a digital wireless carrier operating personal communications services that recently commenced service in certain basic trading areas (BTAs) in rural Oregon, Idaho, and California. In prior TTY Reports, Edge indicated that it planned to upgrade its current TDMA network to an MTX-10 switch from Nortel Networks, Inc. ("Nortel") which, when installed, would make its system capable of transmitting E911 calls from TTY devices. However, Edge is in the process of transitioning from TDMA to a GSM network. At this time, Edge is in the process of determining whether and when it would be practical to upgrade its current TDMA system, or, focus all its resources toward meeting the TTY 911 requirement upon completion of its transition to GSM. In addition. Edge also recognizes that TDMA TTY compatible handsets may not be commercially available by June 30, 2002. The combination of these and other factors may necessitate Edge requesting a waiver and extension of the June 30, 2002 deadline by which digital wireless service providers must be capable of transmitting 911 calls using TTY devices.

Should any questions arise with respect to this matter, please feel free to communicate directly with the undersigned.

Very truly yours,

/s/

Todd Slamowitz

cc: Judy Boly, FCC
Ed Springer, Office of Management and Budget
Kris Monteith, Chief, Policy Division,
Wireless Telecommunications Bureau, FCC

List of recipients:

Ms. Judy Boly Federal Communications Commission 445 Twelfth Street, S.W. Room 1-C804 Washington, D.C. 20554

Ed Springer, OMB Desk Officer New Executive Office Building 725 Seventeenth Street, N.W. Room 10236 Washington, D.C. 20503

Kris Monteith, Chief Policy Division, Wireless Telecommunications Bureau Federal Communications Commission 445 Twelfth Street, S.W. Washington, D.C. 20554